

DEBORAH A. COOKSEY, State Bar No. 118197  
MARTIN H. KRESSE, State Bar No. 048132  
MICHAEL L. SMITH, State Bar No. 217751  
OAKLAND UNIFIED SCHOOL DISTRICT  
1025 Second Avenue, Room 406  
Oakland, CA 94606  
Telephone: (510) 879-8535  
Fax: (510) 879-1833

Attorneys for Defendants  
OAKLAND UNIFIED SCHOOL DISTRICT,  
KIMBERLY STATHAM and GOVERNING BOARD OF  
THE OAKLAND UNIFIED SCHOOL DISTRICT

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

FARM MENG SAEPHAN,

Plaintiff,

vs.

OAKLAND UNIFIED SCHOOL DISTRICT;  
KIMBERLY STATHAM, State Administrator of the  
Oakland Unified School District; GOVERNING  
BOARD OF THE OAKLAND UNIFIED SCHOOL  
DISTRICT,

Defendants.

Case No. C 06 4428 JCS

**STIPULATION AND ~~PROPOSED~~ ORDER  
CONTINUING MAY 30, 2008 FURTHER  
CASE MANAGEMENT CONFERENCE TO  
JULY 25, 2008**

Plaintiff FARM MENG SAEPHAN and Defendants OAKLAND UNIFIED SCHOOL  
DISTRICT; KIMBERLY STATHAM; and GOVERNING BOARD OF THE OAKLAND UNIFIED  
SCHOOL DISTRICT, (collectively "Defendants"), by and through their respective attorneys of  
record, agree as follows:

WHEREAS, the parties have entered into a settlement in principle and are presently  
reviewing and executing the final terms of a settlement agreement which would lead to the potential  
resolution of this matter in its entirety;

WHEREAS, all parties are anticipated to have entered into a settlement by June 24, 2008;

WHEREAS, should all the parties have entered into a settlement, it is anticipated that a  
request for dismissal of the entire action will be filed by July 15, 2008;

1 WHEREAS, the parties appreciate the Court's ongoing consideration and patience in  
2 allowing them ample time to arrive at a potential mutually agreeable final settlement; and

3 WHEREAS, a further case management conference is presently set for May 30, 2008 at  
4 1:30 p.m.;

5 IT IS THEREFORE STIPULATED AND RESPECTFULLY REQUESTED that the Court  
6 continue the May 30, 2008 further case management conference to Friday, July 25, 2008 at 1:30  
7 p.m. Should this matter be successfully settled in the interim, the parties will so notify the Court.  
8 Should this matter not successfully settle, however, the parties will file by Tuesday, July 15, 2008  
9 an updated case management statement and [proposed] order which sets forth new proposed  
10 deadlines and cutoff and trial dates regarding those which were vacated by this Court's December  
11 4, 2007 Order.

12 **IT IS SO STIPULATED.**

13 Dated: May 20, 2008

DEBORAH A. COOKSEY  
Interim General Counsel

15 By: /s/  
Michael L. Smith  
Attorneys for Defendants

17 Dated: May 20, 2008

THE LEGAL AID SOCIETY  
Christopher Ho

19 By: /s/  
Christopher Ho  
Attorneys for Plaintiff

21 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the May 30, 2008 further case  
22 management conference is continued to Friday, July 25, 2008 at 1:30 p.m. Should this matter be  
23 successfully settled in the interim, the parties will so notify the Court. Should this matter not  
24 successfully settle, however, the parties will file by Tuesday, July 15, 2008 an updated case  
25

1 management statement and [proposed] order which sets forth new proposed deadlines and cutoff  
2 and trial dates regarding those which were vacated by this Court's December 4, 2007 Order.

3  
4  
5 **IT IS SO ORDERED.**

6 Dated: May 21, 2008

